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February 14, 2019

VIA ECF

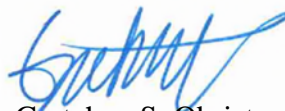
The Honorable Hildy Bowbeer, U.S.M.J.
 United States District Court
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 316 N. Robert Street
 St. Paul, MN 55101
 bowbeer_chambers@mnd.uscourts.gov

Re: *In re EpiPen ERISA Litigation*, Case No. 17-cv-01884 (PAM-HB)

Dear Judge Bowbeer,

The parties respectfully submit the attached proposed joint agenda for the February 21, 2019 case management conference. Thank you.

Very truly yours,



Gretchen S. Obrist
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GSO:srs

cc: All parties of record via ECF
 Attachment

CASE MANAGEMENT CONFERENCE

February 21, 2019

Proposed Joint Agenda

1. Status of Discovery
 - a. Plaintiffs' Requests to Defendants
 1. Status of Defendants' production to date
 2. Meet and Confer status
 1. Document Requests and Interrogatories
 2. Search Terms, Custodians, and ESI Sources
 3. Disputes that may require Court intervention: Objections, Scope, Time Period
 - b. Plaintiffs' Requests to Third Parties
 1. Mylan
 1. Search Terms and Custodians Agreement
 2. Status of Mylan's production to date
 3. Disputes that may require Court intervention: Production Schedule / Delay for relevancy review following application of negotiated search terms (this is Plaintiffs' characterization of their potential disputes with Mylan; Defendants take no position)
 - c. Defendants' Requests to Plaintiffs
 1. Prime's Requests
 - d. Defendants' Requests to Third Parties
 1. Mylan
 2. Prime's Requests to Blue Sea Capital LLC
 3. Prime's Requests to TriNet Group, Inc.
2. Mediation
 - a. Mediator selection complete – Hon. Jeffrey Keyes
 - b. Scheduling mediation for late April 2019